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July 17, 2023

Via ECF

Hon. Loretta A. Preska United States District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: Petersen Energía Inversora, S.A.U. v. Argentine Republic, No. 15-cv-2739 ("Petersen") Eton Park Capital Management, L.P. v. Argentine Republic, No. 16-cv-8569 ("Eton Park")

Dear Judge Preska:

As agreed by the parties, Plaintiffs submit the attached compendium of foreign law sources and translations on which they may rely in the upcoming damages hearing and related briefing. All of Plaintiffs' sources were previously produced or cited by the parties in the course of this litigation.

Argentina has indicated that it intends to use new foreign legal sources that it has never before produced or relied on, despite the years of discovery, motions, and briefing in this case. It included three such sources in its Compendium of Foreign Legal Authorities, which it reserved the right to supplement. *See* ECF Nos. 469-41, 469-42, 469-43. Argentina has not explained why it failed to produce or cite these decades-old sources earlier. It has not, for example, indicated that its new sources are limited to intervening authorities that have been handed down since the close of expert discovery. *Cf.* Federal Rule of Appellate Procedure 28(j).

Plaintiffs object to this latest eleventh-hour maneuver by Argentina, which would prejudice Plaintiffs and undermine the efficiency of this litigation. As the Court has already admonished, the fact that the issues in this case have now narrowed to two issues is not an excuse to introduce new evidence and theories on issues that have been present in the case since the outset. *See* ECF No. 464. Argentina should not be allowed to spring new surprises on Plaintiffs and the Court at this late stage. If the Court nevertheless permits Argentina to rely on

¹ Docket citations are to *Petersen*, Case No. 15-cv-2739.

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new materials, there are additional foreign law sources that support Plaintiffs' positions, which fairness would dictate should then be added to Plaintiffs' compendium.

Respectfully submitted,

/s/Andrew E. Goldsmith

Cc: All counsel of record via ECF

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Exhibit No.	Description	Produced at Beg-Bates	Produced at End-Bates
PLA-1	National Constitution of Argentina	AR00075079	AR00075100
PLA-2	Civil and Commercial Code of Argentina (excerpted)	PT GARRO 000000540	PT GARRO 000000562
PLA-3	Civil and Commercial Code of Argentina (excerpted)	11_011410_00000010	11_0111110_000000000
PLA-4	Civil Code of Argentina (excerpted translations highlighted in Spanish		
	original) Commercial Code (excerpted)		
PLA-5 PLA-6	Argentine Companies Law (Law 19,550)		
		A D00076070	A D 00076096
PLA-7 PLA-8	General Expropriation Law (Law No. 21,499) Algodonera Lavallol S.A s/quiebra, Corte Suprema de Justicia de la	AR00076079 AR00081894	AR00076086 AR00081904
	Nacion, 20 abril 2010		
PLA-9	All Food S.A. s/Concurso Preventivo s/Incidente de Revision de Credito de Garantia de Valores S.G.R., Cámara Nacional de Apelaciones en lo Comercial, Sala F, 18 July 2015	PT_GARRO_000000001	PT_GARRO_000000003
PLA-10	Almiron, Santa Brigida c. Origenes Seguros De Retiro S.A.	PT GARRO 000000004;	PT GARRO 000000022;
1 LA-10	s/Ordinario, CNCom, Div. A, 6 Mar. 2018	PT ROVIRA 000000322	PT ROVIRA 000000340
PLA-11	Argencip S.A v. Fondo Compensador Para Jubilados Y Pensionades Telefonicos, Cámara Nacional de Apelaciones en lo Comercial, Sala AC (30/06/2010), TR LALEY 70064466	PT_GARRO_000000023	PT_GARRO_000000033
PLA-12	Balogh Kovacs, Nicolás Francisco c. Telemultitec SA y otro s/ Ejecutivo, Cámara Nacional de Apelaciones en lo Comercial, sala C	AR00111071	AR00111072
	(10/04/2018), TR LALEY AR/JUR/5126/2018		
PLA-13	Banise S.A. c/Monaco Carlos Alberto y Otros s/Ejecutivo, Cámara Nacional de Apelaciones en lo Comercial, 39.933/2004, 20 April 2018	PT_ROVIRA_000000425	PT_ROVIRA_000000431
PLA-14	Bargero, Carolina y Otro cl Lan Airlines S.A. y Otro s/Perdida/Daño de Equipaje, Cámara Nacional de Apelaciones en lo Civil y Comercial		
PLA-15	Federal, Sala II, 2 June 2021 Bengen, Alvaro Arcadio c/ HSBC Seguros de Vida Argentina S.A. s/Ordinario, Cámara Nacional de Apelaciones en lo Comercial, Sala E,	PT_GARRO_000000119	PT_GARRO_000000130
	12 July 2018		
PLA-16	Betbeder y Cia F. c. FF.CC. Provincia de Buneos Aires, Camara Nacional Comercial, Sala B, agosto 1952	PT_GARRO_000000589	PT_GARRO_000000597
PLA-17	Bicondoa Mendiboure Mabel Noemi c/ Zalcwas Marcelo Manuel s/ Ejecutivo, CNCom., Div. C, 22 December 2015	AR00111073	AR00111079
PLA-18	Bovero Nilda Maria c/ Poder Ejecutivo Nacional y otro s/proceso de conocimiento, Cámara Civil y Comercial Federal, Sala III, 21 June 2017	AR00111115	AR00111123
PLA-19	Bueres, Alberto J. (director), Highton, Elena I., Código Civil y normas complementarias. Análisis doctrinario y jurisprudencial. Tomo 2 A, Buenos Aires, Hammurabi, p. 324	AR00080585	AR00080587
PLA-20	Bustelo, Cesar D. c. La Meridional, Cfa. de seguros, Camara Nacional de Apelaciones en lo Comercial, Sala D (29/09/1989), TR LALEY	PT_ROVIRA_000001057	PT_ROVIRA_000001062
PLA-21	AR/JUR/1140/1989 Caserta, Daniel c/ Bovone, Adrian Guillermo s/ Ejecutivo, Cámara	PT_GARRO_000000159;	PT_GARRO_000000159;
PLA-22	Nacional de Apelaciones en lo Comercial, Sala D, 11 October 2018 Chirife, Clara Susana c. García Sale, Jorge Alberto s/ ordinario,	PT ROVIRA 000000477 PT_GARRO_000000161;	PT ROVIRA 000000477 PT_GARRO_000000166;
	Cámara Nacional de Apelaciones en lo Comercial, Sala F (27/12/2016), AR/JUR/102057/2016	PT_ROVIRA_000000546	PT_ROVIRA_000000551
PLA-23	Colome, Eduardo Héctor y Otro c/Banco de la Nación Argentina s/ Daños y Perjuicios, Camara Civil y Comercial Federal - Sala I, 5 May 2015	AR00111146	AR00111158
PLA-24	Edward Roberto Miguel c/ Ormachea Juan Claudio y Otro s/	PT_GARRO_000000415;	PT_GARRO_000000417;
	Ejecutivo, CNCom., Div. F, 9 February 2010	PT ROVIRA 000000507	PT ROVIRA 000000509
PLA-25	Emindar SRL s/Quiebra s/Incidente de Revision de Credito, Cámara Nacional de Apelaciones en lo Comercial, Sala F, 25 October 2018	PT_GARRO_000000302	PT_GARRO_000000306
PLA-26	Estado Nacional Estado Mayor Gral. de la Fuerza Aérea c/ Scroppo Francisco y otro s/ Daños y Perjuicios, Cámara Civil y Comercial Federal - Sala I, 16 May 2017	AR00111086	AR00111094
PLA-27	Gargiulo Alicia Elena c/ Pedro Peruilh S.A. s/ Ejecutivo, CNCom., Div. C, 28 June 2018	AR00111068	AR00111070
PLA-28		PT_GARRO_000000358; PT_ROVIRA_000000503	PT_GARRO_000000361; PT_ROVIRA_000000506

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Exhibit No.	Description	Produced at Beg-Bates	Produced at End-Bates
PLA-29	Giardino, Carlos S. c. Dentomat S.A., Suprema Corte de Justicia de la	PT GARRO 000000362	PT_GARRO_000000365
	Provincia de Buenos Aires (14/08/1979), TR LALEY		
	AR/JUR/1483/1979		
PLA-30	Metalurgica Morillo, S. R. L. c. Hissuribehere, Italo A., Camara de	PT_ROVIRA_000000989	PT_ROVIRA_000000993
DI 4 21	Apelaciones en lo Civil y Comercial de Junin (23/05/1989), TR		
	LALEY AR/JUR/2137/1989	A D 00111040	A D 00111050
PLA-31	Oyhanarte, Mario Eloy c. De Simone, Silvana Patricia s/ Ejecutivo,	AR00111049	AR00111050
	Cámara Nacional de Apelaciones en lo Comercial , Sala C (13/06/2019), TR LALEY AR/JUR/25033/2019		
	Papasidero Gabriel Osvaldo y otros c/Aoky S.A. s/ ejecutivo, CNCom,	PT ROVIRA 000000808	PT_ROVIRA_000000812
	Sala D, 30/09/2014	1 1_KO VIKI _000000000	1 1_KO VIKI _000000012
PLA-33	Pérez Bonino, Rosana c/ Metlife Seguros de Retiro S.A. s/ amparo ,	AR00111107	AR00111114
	Cámara Civil y Comercial Federal - Sala III, 16 July 2021		
PLA-34	Perez Monica Lourdes c. Enriquez Miguel Angel s/Ordinario, Cámara	PT_GARRO_000000446;	PT_GARRO_000000462;
	Nacional de Apelaciones en lo	PT_ROVIRA_000000529	PT_ROVIRA_000000545
	Comercial, Sala F, 22 October 2015		
PLA-35	Pichoud, Carlos Oscar v. Piffano, Oscar Rodolfo s/ executive,	PT_ROVIRA_000000840	PT_ROVIRA_000000841
	National Court of Appeals in Commercial Matters, Division F		
DI 4 27	(06/12/2018), TR LALEY AR/JUR/68145/2018 Pioltino, Dante C. S.A. c. Deutz Argentina S.A., Cámara Nacional de	DT DOMBA 00000450	DT DOVIDA 000000473
PLA-36	Apelaciones en lo Comercial, Sala D (20/06/1996), TR LALEY	PT_ROVIRA_000000459	PT_ROVIRA_000000472
	AR/JUR/835/1996		
PLA-37	Pizarro-Vallespinos. Tratado de Responsabilidad Civil, Vol I, Parte	PT ROVIRA 000001455	PT ROVIRA 000001457
I Li I S /	General. Rubinzal-Culzoni Editores, Buenos Aires-Santa Fe, 2017,	1 1_100 / 1101 _ 000001 133	11_100 11141_000001137
	page 302.pdf		
PLA-38	Ramon D. Pizarro y Carlos G. Vallespinos, Instituciones de Derecho	AR00080591	AR00080597
	Privado. Obligaciones . Tomo 2, pages 536-540		
PLA-39	Ramon D. Pizarro, La mora del deudor en el Código Civil y	PT_GARRO_000000818	PT_GARRO_000000834
	Comercial, TR LALEY AR/DOC/532/2016		
PLA-40		AR00111036	AR00111048
DI 4 41	Sala C, 8 October 2019	DE CARRO 00000470	DT C + DD C 000000474
PLA-41	Rodriguez, Dino Omar c/ Malsenido, Cristian Roberto y Otro s/	PT_GARRO_000000470	PT_GARRO_000000474
	Ejecutivo, Cámara Nacional de Apelaciones en lo Comercial, Sala F, 2 February 2017		
PLA-42	Ruiz Elsa Maria Rosa y Otro c. Metlife Seguros de Retiro S.A.	PT GARRO 000000475;	PT GARRO 000000493;
121112	s/Ordinario, Cámara Nacional de Apelaciones en lo Comercial, Sala F,		PT ROVIRA 000000528
	11 September 2014	1 1_10 / 110 1	1 1_10 1111_00000020
PLA-43		PT ROVIRA 000001042	PT ROVIRA 000001049
12.1	en lo Civil, Sala F (12/05/1997), TR LALEY AR/JUR/645/1997		
PLA-44	Sandra M. Wierzba, Régimen actual de la mora, TR LALEY	PT_GARRO_000000906	PT_GARRO_000000915
	AR/DOC/3527/2017		
PLA-45	Scotia Bank Uruguay S.A c/Banco de la Nación Argentina s/	AR00111095	AR0011106
	Incumplimiento de contrato, Cámara Civil y Comercial Federal - Sala		
DI A 46	I, 16 April 2018 Sociedad def Estado Casa de Moneda c/ Carmelo Pulice y Hnos. S.A.	AR00111124	A D 00111120
PLA-46	s/Faltante y/o Averia de Carga Transp Terrestre, Cámara Nacional de	AR00111124	AR00111138
	Apelaciones en lo Civil y Comercial Federal - Sala II, 17 February 2017		
	Inpotationes on to civily compretate feature said it, 17 restaury 2017		
PLA-47	Syngenta Agro SA c. Agrocor Insumos SRL s/ejecutivo, Cámara	PT ROVIRA 000000838	PT ROVIRA 000000839
	Nacional de Apelaciones en lo Comercial, SalaB (27/03/2017), TR		
	LALEY AR/JUR/6953/2017		
PLA-48	T. EL S., V. c/P., L. s/ Ordinario, Cámara Nacional de Apelaciones en		
	lo Comercial - Sala F (14/02/2019), El Derecho - Digital, 2019 ED-		
	DCCCXXXIX-15	L D 0.0444.6.7.1	L D 0044 5 0 5 =
PLA-49	Tech Data Corporation c/ Soluciones Integrales Corporativas S.A. y	AR00111051	AR00111067
DI 4 50	otros, CNCom., Div. C, 13 July 2018	DT CARRO 00000520	DT CARRO 00000525
PLA-50	Tonni, Juana Victorina el Banco de la Provincia de Buenos Aires	PT_GARRO_000000528	PT_GARRO_000000535
	s/Ordinario, Cámara Nacional de Apelaciones en lo Comercial, Sala		
PLA-51	F, 18 May 2017 Vedebe Trading S.A. c/Fideicomiso Josa I s/Ejecucion Prendaria,	AR00111080	AR00111085
1 LA-J1	reactor fraumg 5.71. c/fractomist Josa 1 s/ Ejecucion frenauria,	11100111000	21100111003

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Exhibit No.	Description	Produced at Beg-Bates	Produced at End-Bates
PLA-52	Vernet Coop de Credito Vicienda y Consumo Ltda c/ Schartez Ariel	PT_GARRO_000000567;	PT_GARRO_000000571;
	Gerardo s /Ejecutivo, CNCom., Div. A, 17 December 2010	PT ROVIRA 000000926	PT ROVIRA 000000930
PLA-53	Yacimientos Petroliferos Fiscales c/ Corrientes, Provincia de y Banco	AR00110956;	AR00110974;
	de Corrientes s/cobro de australes, Corte Suprema de Justicia de la	PT_BIANCHI_000000664	PT_BIANCHI_000000706
	Nación, 3 March 1992		